

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS MDL NO. 2327
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT APPLIES TO:
ETHICON WAVE 8 CASES LISTED
IN EXHIBIT A OF DEFENSE
NOTICE OF ADOPTION (Dkt. 6899)

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE
OF DR. JERRY BLAIVAS**

Plaintiffs hereby adopt and incorporate by reference Plaintiffs' Opposition to Boston Scientific Corporation's Motion and Memorandum in Support to Exclude the Opinions and Testimony of Jerry Blaivas, M.D. from Boston Scientific Wave 3. *See* ECF No. 4962. Plaintiffs respectfully request that the Court deny Defendant's motion for the reasons expressed in the Wave 3 response briefing.

DATED: October 24, 2018

Respectfully submitted,

By: /s/ Clayton A. Clark
Clayton A. Clark
Co-Lead Counsel for Plaintiffs in
MDL No. 2326
cclark@triallawfirm.com

CLARK, LOVE & HUTSON, G.P.
440 Louisiana St., Ste. 1600
Houston, Texas 77002
Telephone (713) 757-1400
Facsimile (713) 759-1217

By: /s/ Aimee Wagstaff
Aimee Wagstaff
Co-Lead Counsel for Plaintiffs in
MDL No. 2326
aimee.wagstaff@andruswagstaff.com

ANDRUS WAGSTAFF, P.C.
7171 W. Alaska Drive
Lakewood, Colorado 80226
Telephone: (303) 376-6360
Facsimile: (303) 376-6361

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2018 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Clayton A. Clark
Clayton A. Clark
Co-Lead Counsel for Plaintiffs in
MDL No. 2326
cclark@triallawfirm.com

CLARK, LOVE & HUTSON, G.P.
440 Louisiana St., Ste. 1600
Houston, Texas 77002
Telephone (713) 757-1400
Facsimile (713) 759-1217